

A comment letter was received from the City of Moreno Valley following the close of the Draft PEIR comment period and publication of the Final PEIR.

**17. Trent D. Fulliam, P.E., Public Works Director/City Engineer, City of Moreno Valley, Public Works Department. February 9, 2005 (Received February 15, 2005).**

**Response 17-1**

The commentor states that the analysis in the Traffic Study performed by Meyer, Mohaddes Associates, Inc. (MMA) differed from the Transportation/Traffic section of the Draft PEIR. The PEIR section contained updated information that was not included in the Traffic Study. Therefore, the analysis in the PEIR supplemented the information presented in the traffic study to ensure provision of the most current information. This comment does not address a specific environmental issue nor raise any question regarding the analysis or conclusions in the PEIR. No further response is necessary.

**Response 17-2**

The comment states that the Draft PEIR did not analyze impacts to intersections and roadways outside of the Planning Area. This statement is correct. The project is a comprehensive update of the City's General Plan, including the Circulation and Community Mobility Element, and the focus of the project is how the City can plan its circulation system to meet future growth in Riverside and to accommodate projected regional growth on Riverside's road network, including high volumes of traffic from Moreno Valley that use Alessandro Avenue as a freeway bypass. Thus, the focus of the analysis is necessarily on Riverside's road network.

The comment also states that future traffic on freeways will significantly increase traffic volumes on the I-215 south of the SR-60. As stated in the Draft PEIR on page 5.15-63, the project will facilitate growth that will generate additional traffic on regional freeways, as follows:

Development consistent with Project implementation will facilitate new growth in the Planning Area that can be expected to generate additional traffic on regional freeways. Analysis indicates that under Project buildout conditions, all freeway segments in the Planning Area will operate at LOS F. Although analysis indicates that the freeway traffic attributable to Project buildout accounts for about one-third or less of freeway traffic increases, the impacts are nevertheless considered significant and unavoidable. As freeways are under the jurisdiction of Caltrans, the City has no authority to make improvements **to the freeway system** that could potentially lessen the impacts of Project-related traffic. As regional traffic (trips that neither begin nor end in the City of Riverside) constitutes a significant component of projected freeway traffic, it is unlikely that even a complete development moratorium in the City of Riverside could lead to acceptable levels of service on Riverside's freeway segments. Indeed, such a moratorium would likely have the impact of pushing new development farther north, east and south of the City, with little if any tangible improvement to freeway operations.

Even if all growth in Riverside is halted until 2025, regional traffic congestion will still persist. This impact is significant and unavoidable, and a statement of overriding considerations will be adopted by the Riverside City Council.

### Response 17-3

The commentor states that the source for Table 5.15-8 was not provided in the Draft PEIR. The source for the table is Caltrans and Meyer, Mohaddes Associates, Inc. This will be updated in the Final PEIR Errata and is shown below. No further response is required.

**Table 5.15-8  
Future Freeway Level of Service**

Segment	Existing ADT	Existing Peak Hour Volume	Existing LOS	Future ADT	Future LOS	Percentage of Future Trips Starting/Ending in Planning Area
<b>State Route 91</b>						
Pierce St to Magnolia Ave	176,000	14,700	F	207,388	F	25%
Magnolia Ave to La Sierra Ave	178,000	14,900	F	212,021	F	26%
La Sierra Ave to Tyler St	178,000	14,900	F	201,994	F	33%
Tyler St to Van Buren Blvd	180,000	15,100	F	223,970	F	34%
Van Buren Blvd to Adams St	174,000	14,600	F	210,860	F	35%
Adams St to Madison St	176,000	14,700	F	207,363	F	34%
Madison St to Arlington Ave	176,000	14,300	F	210,496	F	36%
Arlington Ave to Central Ave	177,000	14,200	F	194,074	F	35%
Central Ave to 14th St	172,000	13,600	F	218,697	F	38%
14th St to University Ave	171,000	13,400	F	222,644	F	38%
University Ave to Mulberry St	162,000	12,600	F	211,011	F	36%
Mulberry St to La Cadena Dr	162,000	12,400	F	211,011	F	36%
La Cadena Dr to SR-60	160,000	12,400	E	211,011	F	36%
<b>I-215/SR 60</b>						
SR-60 to Spruce St	183,000	15,600	F	293,672	F	17%
Spruce St to 3rd St/Blaine St	171,000	14,700	F	293,672	F	17%
3rd St/Blaine St to University Ave	170,000	14,800	F	287,065	F	17%
University Ave to Martin Luther King Blvd	177,000	15,400	F	301,093	F	17%
Martin Luther King Blvd to El Cerrito Dr	181,000	16,300	F	308,012	F	16%
El Cerrito Dr to Central Ave	188,000	16,900	F	308,012	F	16%
Central Ave to Box Springs Rd	180,000	16,200	F	324,521	F	16%
Box Springs Rd to SR-60	110,000	8,900	C	322,302	F	16%
SR-60 to Eastridge Ave	112,000	9,000	E	185,017	F	12%
Eastridge Ave to Alessandro Blvd	106,000	9,000	E	197,972	F	18%
Alessandro Blvd to Frontage Rd	104,000	8,900	D	200,519	F	18%
Frontage Rd to Van Buren Blvd	105,000	9,000	D	202,308	F	16%

Source: Meyer, Mohaddes Associates, Inc. and Caltrans, 2004

**Response 17-4**

The commentor states that technical traffic data were not provided in the PEIR for review. This information is available at City Hall along with other technical reports and appendixes used in the Draft PEIR. Due to the volume of the document, all referenced information could not be included in the printing of the Draft PEIR. However, the information is public record and can be made available for review upon request at City Hall.

**Response 17-5**

The commentor requests that a figure or a table summary be provided showing the funded transportation improvements assumed in the Future Build-out analysis. The analysis assumes that all network components would be funded and in place at build-out. The pacing of improvements over time will be in accord with the City's adopted Capital Improvement Plan. The CIP will be subject to change over time but will reflect improvements needed to achieve the network adopted as part of the General Plan.

**Response 17-6**

The commentor suggests that a traffic analysis zone map and a summary of existing and future land use and trip generation be conducted for the project. The land use alternatives used in traffic modeling were formulated by the City and consultant team through the Citizens Advisory Committee (CAC) process. The land uses were computed into a model that predicted trip generation for future traffic.

The City was divided into a series of small geographic areas called "Transportation Analysis Zones" (TAZ) and incorporated into a model used to predict the change in trip making. Within each TAZ, the future land use quantities were determined. From that data, the number of vehicle trips to and from each zone is estimated. Then the model is used to assign the trips to the roadway system and project how many trips each road will carry. There are several types of trips, those that travel from one point in Riverside to another point in the City (internal-to-internal trips), those with one end outside the City and one end inside the City (internal-to-external or external-to-internal) and those that simply pass through the City on City roadways but do not stop (external-to-external). The external-to-external trips are also called "through" trips. In Riverside, as in other Inland Empire cities, through trips are increasingly a major problem due to freeway congestion. Freeway congestion causes motorists to use city streets as alternative routes, although the streets were really designed for travel to and from Riverside destinations. The model takes into account all of the trip types.

MMA prepared a TAZ map that was based on the SCAG model and then further refined into smaller TAZs to account for planned development in Riverside pursuant to General Plan policy. The base data for existing traffic conditions within each TAZ was SCAG data. Future conditions were based upon General Plan land use build-out data provided to MMA for their analysis. All of this information is part of the public record developed for the General Plan and used by reference in the PEIR.

**Response 17-7**

The commentor states that the thresholds for level of service (LOS) conditions are inconsistent in the PEIR and the Traffic Study. The thresholds listed in Section 5.15 Transportation/Traffic state that a significant impact would occur if the project would cause an increase in traffic to an intersection or roadway to operate at LOS "E" unless the intersection or roadway is identified in the General Plan Circulation and Community Mobility Element as a location where LOS "E" is acceptable. The General Plan makes the following statement about LOS:

The City will strive to maintain LOS D or better on arterial streets wherever possible. At some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis. Locations that may warrant the LOS E standard include portions of Arlington Avenue/Alessandro Boulevard, Van Buren Boulevard throughout the City, portions of La Sierra Avenue and selected freeway interchanges. (Circulation and Community Mobility Element, page CCM-13)

As stated previously as well as in the Traffic Study, LOS E is considered significant at most locations, except for certain key locations determined by the City to be acceptable with LOS E.

Refer to Response 17-5 regarding the circulation system supporting the proposed Land Use and Urban Design Element and projected growth, as required by State law.

**Response 17-8**

The commentor suggests that only some figures in the General Plan and PEIR show the CETAP alignment for the Main Street/Pigeon Pass connection. The connection is shown on Figure 5-40, Year 2025 Volume to Capacity Ratio. However, the connection is not shown on any figure describing the existing roadway network or existing conditions. This future roadway is a CETAP roadway that lies beyond the Riverside corporate limits; only the Main Street portion falls within the Planning Area along the Riverside/San Bernardino County border. Because this is not a roadway that the City of Riverside will be funding as part of its long-range planning efforts, the future connection is not shown on the Master Plan of Roadways or any other official General Plan maps that incorporate this base map. Even though the connection was assumed in future regional modeling, the connection will not be shown as a part of the roadway network. Therefore, the connection was not shown on certain figures.

**Response 17-9**

The commentor states that the discussion of the Sycamore Canyon Business Park/Canyon Springs neighborhood in the Land Use Element of the Riverside General Plan is geared toward developing the area with job-intensive uses. This comment does not address a specific environmental issue nor raise any question regarding the analysis or conclusions in the PEIR. No response is necessary.

**Response 17-10**

The commentor states that the General Plan update discusses the changes made to the zoning designations and land uses but does not specify the amount of development allowed by the new designations or the increase in development. As stated in Section 6.2 Growth Inducing Impacts, development associated with the project will result in the increase of 38,100 new dwelling units, an increase of 42 percent, and 39,600,000 square feet of new non-residential construction, an increase of 31 percent, over the next 20 year horizon. As this is a first-tier, Program EIR, CEQA analysis of the construction of future development associated with proposed land uses may be properly deferred until plans for such uses are developed. Since detailed plans for future development are not available at this time, the analysis is not available to be included in the PEIR.

The commentor also states that intersections in the northwest corner of the City of Moreno Valley could potentially be impacted by future growth and intensification of land uses in the City of Riverside, specifically in the Sycamore Canyon Business Park/Canyon Springs neighborhood. As stated previously, the project will facilitate growth that will generate additional traffic on regional freeways. Even if a complete development moratorium in the City of Riverside was adopted, it is unlikely that acceptable levels of service on freeway segments within and adjacent to the City of Moreno Valley would result. Therefore, the impact is significant and unavoidable, and a statement of overriding considerations will be adopted by the Riverside City Council.